

EXHIBIT B

U.S. Patent No. 7,590,636 – T-Mobile USA, Inc. and T-Mobile US, Inc.

Claims 4, 5, 8, and 9

Gravel Rating Systems (“Gravel”) provides evidence of infringement of at least claims 4-5 and 8-9 of U.S. Patent No. 7,590,636 (hereinafter “the ’636 patent”) by T-Mobile USA, Inc. and T-Mobile US, Inc. (collectively, “T-Mobile” or “Defendants”). In support thereof, Gravel provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least methods practiced on Defendants’ website and/or computer systems hosting Defendants’ website, wherein user comments and ratings were collected and stored regarding mobile and other devices that T-Mobile has sold, offered for sale, made, used, provided and/or caused to be used by others, which by way of example include such websites and/or systems relating to mobile phones (*see, e.g.*, <https://www.t-mobile.com/cell-phone/apple-iphone-11?sku=190199220010>) (the “Accused Instrumentalities”). These claim charts demonstrate Defendants’ infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Defendants have not yet provided any non-public information. An analysis of Defendants’ (or other third parties’) technical documentation and/or software source code may assist in fully identifying all infringing features and functionality. Accordingly, Gravel reserves the right to supplement this infringement analysis once such information is made available to Gravel. Furthermore, Gravel reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

Unless otherwise noted, Gravel contends that Defendants directly infringed at least claims 4-5 and 8-9 of the ’636 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, causing to be used and/or importing the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. A comparison of the Accused Instrumentalities to claim 1 of the ’636 patent is also provided because each of claims 4-5 and 8-9 depends therefrom.

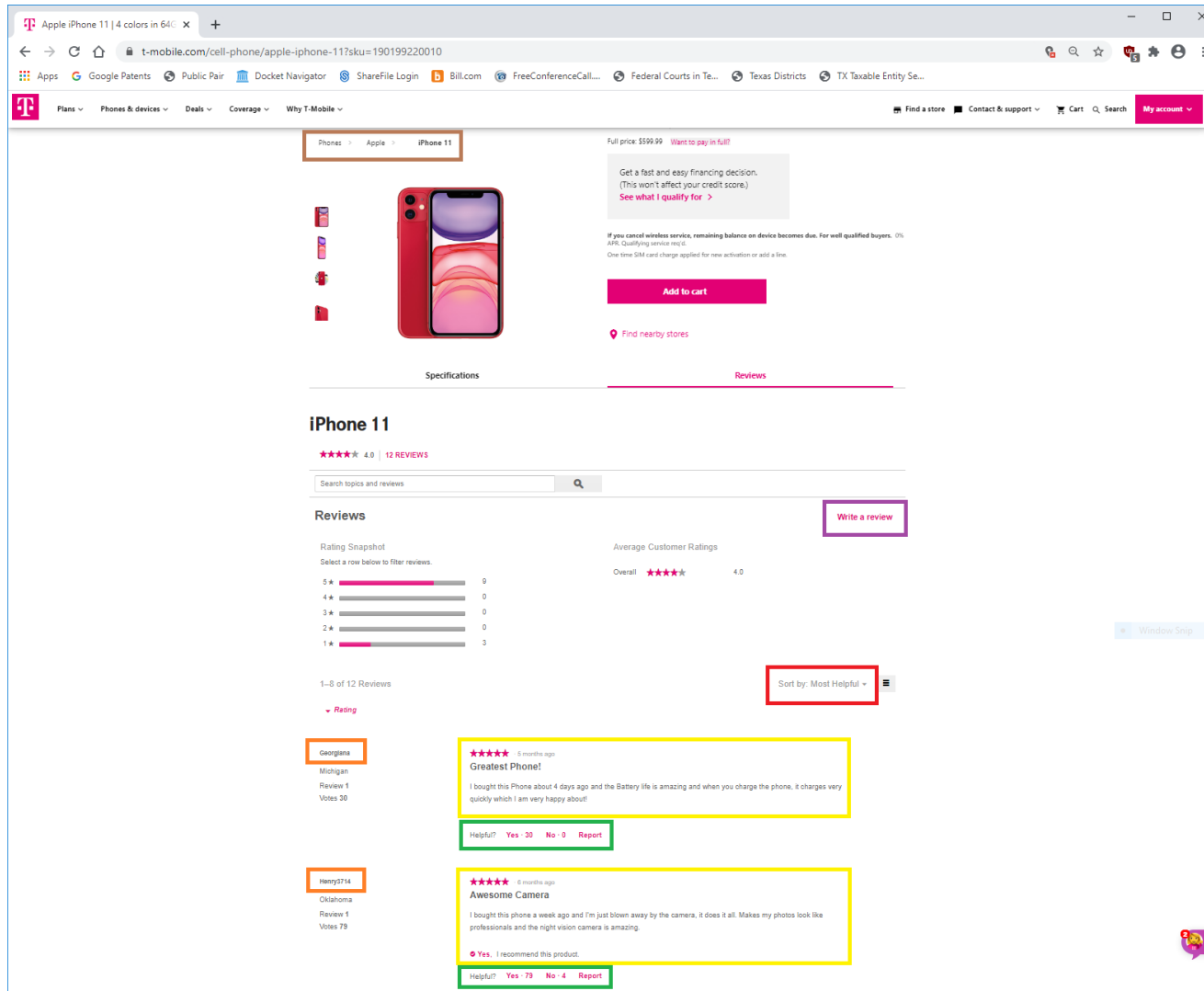
Unless otherwise noted, Gravel believes and contends that each element of each claim asserted herein is literally met through Defendants’ provision of the Accused Instrumentalities. However, to the extent that Defendants attempt to allege that any asserted claim element is not literally met, Gravel believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, Gravel did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, Gravel asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. Gravel reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Defendant. Gravel also reserves the right to amend this infringement analysis by citing other claims of the ’636 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities.

GRAVEL RATING SYSTEMS'S ANALYSIS OF INFRINGEMENT

Gravel further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the “Accused Instrumentalities” column of each chart.

The following screenshot(s) is representative of websites hosted by Defendants that offer products and/or services for sale.



<https://www.t-mobile.com/cell-phone/apple-iphone-11?sku=190199220010>

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'636 Patent: Claim 1	T-Mobile Accused Instrumentalities
1. A computer-implemented method comprising:	Defendants' e-commerce website provides an automated, or computer-implemented, method for users to write and/or rate reviews by clicking one or more buttons. Reviews may be sorted by helpfulness. This is shown by the above screenshot(s).
a computer system storing items of information in a database, wherein the items are received from a first set of two or more of a plurality of remote computer systems coupled to the computer system via a computer network;	<p>Defendants utilize a computer system to host Defendants' e-commerce website and to store items of information, such as reviews, in a database. As shown on Defendants' website, the items (i.e., reviews) are received from a first set of two or more of a plurality of remote computer systems (i.e., two or more users utilizing web browser software on respective computing devices) coupled to Defendants' computer system via a computer network (i.e., the Internet).</p> <p>The above screenshot(s) shows two user reviews (boxed in yellow), which were received by Defendants' computer system, via the Internet, from two different users (boxed in orange) utilizing two respective user devices of a population of user devices accessing Defendants' website (i.e., "two or more of a plurality of remote computer systems coupled to the computer system via a computer network"). The users submitted their reviews by selecting the button boxed in purple in the above screenshot(s).</p>
the computer system receiving, via the computer network, submissions regarding two or more particular ones of the stored items of information, wherein each submission is received from a corresponding one of a second set of two or more of the plurality of remote computer systems, wherein each of said submissions includes a rating and/or a comment	Defendants' computer system receives, via the computer network (i.e., via the Internet and via its website), submissions regarding two or more particular ones of the stored items of information (i.e., two or more particular stored reviews), wherein each submission is received from a corresponding one of a second set of two or more of the plurality of remote computer systems (i.e., two or more user devices utilizing web browser software on respective computing devices of the population of user devices accessing Defendants' website), wherein each of said submissions includes a rating and/or a comment (i.e., at least one rating or one comment) regarding a corresponding one of the stored items (i.e., a review of the two or more stored reviews) that has been transmitted to the corresponding remote computer system via the computer network by the computer system (i.e., sent to a corresponding user device, of the

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<p>regarding a corresponding one of the stored items that has been transmitted to the corresponding remote computer system via the computer network by the computer system;</p>	<p>two or more user devices, via the Internet by Defendants' computer system to be displayed via a web browser, for example).</p> <p>The above screenshot(s) shows two user reviews (boxed in yellow), which are stored by Defendants' computer system (i.e., "two or more particular ones of the stored items of information"). Defendants' computer system received submissions for each of these two reviews, and each submission included a rating and/or comment, as indicated by the content inside the green boxes.</p> <p>For example, Defendants' website displays that Defendants' computer system received submissions regarding helpfulness of the reviews, as boxed in green. Submissions associated with the reviews were received from two or more user devices (i.e., the submissions were received from a corresponding one of a second set of two or more of the plurality of remote computer systems) via the Internet (i.e., the computer network). To facilitate the submissions, the stored reviews were transmitted to the two or more user devices (i.e., two of the plurality of remote computer systems) by Defendants' computer system via the Internet (i.e., transmitted via the computer network by the computer system) (e.g., for display via a web browser).</p>
<p>the computer system storing the received submissions in the database;</p>	<p>Defendants' computer system stores received ratings and/or comments (i.e., submissions) in the database, as each rating and/or comment is associated with and displayed with its respective review, as shown in the above screenshot(s) where the ratings boxed in green are associated with each review boxed in yellow.</p>
<p>the computer system receiving a request from a given one of the plurality of remote computer systems to view a listing of the stored items of information according to an ordering consistent with a selected criterion that</p>	<p>Defendants' computer system facilitates the receiving of requests from a given one of the plurality of remote computer systems (i.e., a user device of the population of user devices requesting to view and/or access Defendants' website) to view a listing of the stored items of information (i.e., the reviews) according to an ordering consistent with a selected criterion that pertains to the stored submissions (i.e., sorted by a criterion pertaining to the ratings and/or comments).</p>

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<p>pertains to the stored submissions; and</p>	<p>For example, the above screenshot(s) shows Defendants' website (i.e., of Defendants' computer system) displaying a list of reviews (i.e., a listing of the stored items of information), shown boxed in yellow. The displayed reviews may be sorted by "Most Helpful," as indicated by the selection that is boxed in red (i.e., selected criterion) in the dropdown labeled "Sort by." This sorting criterion pertains to the stored ratings (i.e., stored submissions) associated with each review (i.e., sorting is based on "helpfulness" ratings). Therefore, the reviews are listed "according to an ordering consistent with a selected criterion that pertains to the stored submissions." This list of reviews was requested by a user device (i.e., a remote computer system) when the user device requested to view and/or access Defendants' website.</p>
<p>responsive to the request, the computer system providing a first set of data to the given remote computer system, wherein the first set of data is usable on the given remote computer system to display said listing of the stored items according to said ordering.</p>	<p>Defendants' website received the request from the given remote computer system (i.e., user device) to access Defendants' website. Responsive to the request, Defendants' computer system served the first set of data (i.e., the website) to the given remote computer system. The first set of data is usable on the given remote computer system to display said listing of the stored items (i.e., the website data is used to display the reviews on the user device) according to said ordering (i.e., sorting).</p> <p>As shown in the above screenshot(s), in response to the user device request to access and view Defendants' website, Defendants' computer system provided the user device with data comprising Defendants' website that is usable by the user device to display content of Defendants' website (i.e., a first set of data usable on the given remote computer system to display the website). Defendants' website displays a listing of reviews, boxed in yellow, which are sorted by "Most Helpful," as indicated by the selection that is boxed in red (i.e., selected criterion) in the dropdown labeled "Sort by." This sorting criterion pertains to the stored ratings (i.e., stored submissions) associated with each review. Therefore, Defendants' website displays said listing of reviews according to said ordering, which is consistent with a selected criterion that pertains to the stored submissions.</p>

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Claim 4	Accused Instrumentalities
4. The method of claim 1, wherein the database includes an extensible hierarchy of information categories, wherein the method further comprises permitting said given remote computer system to navigate through the extensible hierarchy.	<p>Defendants' database includes an extensible hierarchy of information categories, wherein the method further comprises permitting said given remote computer system (i.e., a user device) to navigate through the extensible hierarchy.</p> <p>As shown boxed in brown in the above screenshot(s), Defendants' website includes a hierarchy of information categories. Each category is clickable by a user to navigate to another page of the website that is associated with information pertaining to each category. The hierarchy is extensible in that Defendants may add or remove information categories to simplify the website and/or user navigation.</p>

Claim 5	Accused Instrumentalities
5. The method of claim 4, wherein the request is received from the given remote computer system after receiving information from the given remote computer system indicating that a	<p>Defendants' website may receive the request from the given remote computer system (i.e., the user device) to view the listing of the stored items of information (i.e., the reviews) after receiving information from the given remote computer system (i.e., the user device) indicating that a user of the given remote computer system (i.e., the user device) has elected to navigate to a particular one of the information categories within the extensible hierarchy, wherein said stored items of information (i.e., the reviews) are associated with the particular information category.</p> <p>As described above, Defendants' database includes an extensible hierarchy of information categories that a user of a given remote computer system (i.e., a user device) may navigate. As described above, a user may navigate the hierarchy by clicking a category such as one of those boxed in brown in the above screenshot(s). For example, a user may have clicked the rightmost category boxed in brown on a previous webpage, and/or a</p>

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<p>user of the given remote computer system has elected to navigate to a particular one of the information categories within the extensible hierarchy, wherein said stored items of information are associated with the particular information category.</p>	<p>category lower in the hierarchy than the rightmost category, to arrive at the webpage with reviews (“stored items of information”) shown in the screenshot(s). The rightmost category corresponds to the type of product shown in the screenshot(s), and the reviews are associated with this type of product.</p>
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Claim 8	Accused Instrumentalities
<p>8. The method of claim 1, wherein the computer system maintains at most one rating per contribution source for any given one of the stored items of information.</p>	<p>Defendants’ computer system maintains at most one rating per contribution source (i.e., user) for any given one of the stored items of information (i.e., reviews).</p> <p>As shown in the above screenshot(s), and as described above with respect to claim 1, ratings are boxed in green. A user may submit at most one rating per review (i.e., by clicking a button boxed in green). Therefore, Defendants’ computer system also maintains at most one rating per user (“contribution source”) per review (“any given one of the stored items of information”).</p>

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Claim 9	Accused Instrumentalities
<p>9. The method of claim 1 further comprising: controlling said receiving and said storing of the submissions to prevent a given contribution source from rating a given one of the stored items of information more than once.</p>	<p>Defendants' computer system controls said receiving and said storing of the submissions (i.e., ratings) to prevent a given contribution source (i.e., user) from rating a given one of the stored items of information (i.e., reviews) more than once.</p> <p>As shown in the above screenshot(s), and as described above with respect to claim 1, ratings are boxed in green. A user may submit at most one rating per review (i.e., by clicking a button boxed in green). Therefore, Defendants' computer system controls the receiving and the storing of ratings ("submissions") to prevent a user ("given contribution source") from rating a review ("a given one of the stored items of information") more than once.</p>

Caveat: The notes and/or cited excerpts utilized herein are set forth for illustrative purposes only and are not meant to be limiting in any manner. For example, the notes and/or cited excerpts, may or may not be supplemented or substituted with different excerpt(s) of the relevant reference(s), as appropriate. Further, to the extent any error(s) and/or omission(s) exist herein, all rights are reserved to correct the same.